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*Special Litigation Counsel for Debtors and
Plaintiff Celsius Network Limited*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹
Debtors.

CELSIUS NETWORK LIMITED,
Plaintiff,

v.

STAKEHOUND SA,
Defendant.

Chapter 11
Case No. 22-10964 (MG)
Jointly Administered

Adversary Proceeding
No. 23-01138 (MG)

NOTICE OF MOTION FOR TEMPORARY RESTRAINING ORDER

¹ The Debtors in these chapter 11 cases (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network, Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The Debtors’ service address in these Chapter 11 Cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure (“FRBP”) 7065 and Federal Rule of Civil Procedure (“FRCP”) 65, Plaintiff Celsius Network Limited (“Celsius”) respectfully submit this Notice of Motion for Temporary Restraining Order (the “Notice” of the “Motion”) against Defendant StakeHound S.A. (“StakeHound”). In support of the Motion, Celsius submits the contemporaneously filed (i) Memorandum in Support of the Motion (the “Memorandum”); (ii) Declaration of Richard Man in support of the Motion, including all exhibits annexed thereto; (iii) Declaration of Felix Dasser, Esq., in support of the Motion, including the exhibit annexed thereto; and (iv) Declaration of Mitchell Hurley, Esq., in support of the Motion, including all exhibits annexed thereto.

PLEASE TAKE FURTHER NOTICE that a hearing on the relief requested in the Motion will be held before the Honorable Martin Glenn on **August 24, 2023, at 5:00 p.m., prevailing Eastern Daylight Time**. The hearing will be conducted via Zoom®. Parties wishing to participate in the hearing must register their appearance utilizing the Electronic Appearance portal located on the Court’s website at: <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Appearances must be entered as soon as practicable. Additional information concerning how to participate in the hearing is available in the Court’s Zoom Video Hearing Guide, available at: <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/celsius>. You may also obtain copies of the Motion filed in these chapter 11 cases by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: August 23, 2023
New York, New York

AKIN, GUMP, STRAUSS, HAUER & FELD LLP

By: /s/ Mitchell P. Hurley
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